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5 Attorneys for Plaintiff
6 GARY A. FISK

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

0 GARY A. FISK,) Case No.: 2:16-cv-00291-JAD-GWF
1 Plaintiff,)
2 vs.) UNOPPOSED MOTION TO EXTEND
3) TIME TO FILE MOTION FOR
4 CAROLYN W. COLVIN, Acting) REMAND AND/OR REVERSAL
5 Commissioner of Social Security,)
6 Defendant)

Plaintiff Gary A. Fisk (“Plaintiff”) and defendant Carolyn Colvin, Acting
Commissioner of Social Security (“Defendant”), through their undersigned counsel
of record, hereby stipulate, subject to the approval of the Court, to extend the time
for Plaintiff to file Plaintiff’s Motion for Reversal and/or Remand to August 19,
2016; and that Defendant shall have 30 days or until September 19, 2016, to file
her opposition, if any is forthcoming. Any reply by plaintiff will be due October
10, 2016.

An extension of time for plaintiff is needed due to a serious illness. The spouse of the associate in Counsel's firm who this matter is assigned is dealing with

1 his Spouse's terminal illness which has unexpectedly worsened in the last few
2 weeks. Subsequent to a surgical procedure on July 6, 2016 to remove tumors in
3 the spine/hip as a result of stage 4 breast cancer, Counsel's spouse was not
4 discharged until July 9, 2016 and then Counsel's spouse was re-admitted to the
5 hospital for 5 days on July 15, 2016 due to complications arising from the July 6th
6 surgery. Counsel's spouse was also recently admitted on August 1, 2016 and then
7 discharged on August 5, 2016, to provide treatment for intractable pain related to
8 the terminal illness. Counsel sincerely apologizes to the court for any
9 inconvenience this may have had upon it or its staff.

10 Counsel for defendant has indicated, via e-mail, that this motion to extend
11 the time to file is not opposed.

12 | DATE: August 15, 2016, Respectfully submitted,

ROHLFING & KALAGIAN, LLP

/s/ *Marc V. Kalagian*

BY: _____

Marc V. Kalagian
Attorney for plaintiff GARY A. FISK

* /S/ April A. Alongi

April A. Alongi
Special Assistant United States Attorney
Attorney for Defendant
[*Via email authorization]

1 IT IS SO ORDERED:
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5 UNITED STATES MAGISTRATE JUDGE

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10 DATED: August 16, 2016
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